

EPA REGISTRATION FILE JACKET

REGISTRATION # 264-1035

Volume 2



264-1035

208



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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg.
Number:

264-1035

Date of
Issuance:

SEP 11 2008

NOTICE OF PESTICIDE:

Registration
XX Reregistration
(under FIFRA, as amended)

Terms of Issuance:

Conditional

Name of Pesticide Product:

PROSPER T200
Insecticide and
Fungicide Seed
Treatment

Name and Address of Registrant (includes ZIP Code):

Bayer CropScience LP
P.O. Box 12014
2 T.W. Alexander Dr.
Research Triangle Park, NC 27709

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

Based on your response to the Reregistration Eligibility Document(s) for **Carboxin**, EPA has reregistered the product listed above provided that the following changes are made to the label:

1. On page 2, change "Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment." to "Do not contaminate water, food, or feed by storage and disposal."

..... Continued on Next Page

Signature of Approving Official:

Mary L. Waller

Mary Waller
Product Manager (Team 21)
Fungicide Branch
Registration Division

Date:

SEP 11 2008

2. On page 2, under the Environmental Hazard heading, delete current statement and add "Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

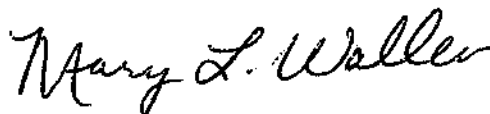
This product contains metalaxyl that is known to leach through soil into groundwater under certain condition as result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

- Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds."
3. On page 2, in the Labeling of Treated Seed section, add "This product contains metalaxyl that is known to leach through soil into groundwater under certain condition as result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination."
 4. Because the REI for Metalaxyl is 24 hours, on page 2, change "do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours" to "do not enter or allow worker entry into the treated areas during the restricted-entry interval (REI) of 24 hours."
 5. On page 4, after the Conditions heading, revise "All such risks shall be assumed by the user or buyer." by adding "To the extent consistent with applicable law, all such risks..."

This action is taken under the authority of section 4(g)(2)(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Submit one (1) copy of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supersede all previously accepted labels. A copy of your label stamped "Accepted with Comments" is enclosed for your records. If you have questions concerning this letter, you may contact me at 703-308-9354.

Sincerely,



Mary Waller
Product Manager (Team 21)
Fungicide Branch
Registration Division (7505P)

Enclosure

PROSPER® T200 Insecticide and Fungicide Seed Treatment

PROSPER T200 contains the following amount of active ingredient per gallon:
1.19 lb. clothianidin; 0.06 lb. trifloxystrobin; 0.42 lb. carboxin; 0.045 lb. metalaxyl.

ACTIVE INGREDIENTS:

Clothianidin: [(C(E))-N-(2-chloro-5-thiazolyl)methyl]-N'-methyl-N"-nitroguanidine	11.05%
Trifloxystrobin	0.552%
Carboxin: 5,6-dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide	3.87%
Metalaxyl: N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester	0.414%
OTHER INGREDIENTS:	84.114%
TOTAL	100.00%

EPA Reg. No. 264-1035

EPA Est.

KEEP OUT OF REACH OF CHILDREN CAUTION

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577
For PRODUCT USE Information Call 1-866-99BAYER (1-866-992-2937)

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

In case of emergency call toll free the Bayer CropScience Emergency Response Telephone No. 1-800-334-7577.
Have a product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, neoprene rubber. If you want more options, follow the instructions for category C and E on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, and other handlers must wear:

- long sleeved shirt and long pants,
- socks plus shoes,
- chemical resistant gloves, except when bagging or sewing bags of treated seeds,
- chemical resistant aprons when mixing, loading, or participating in dip treatments.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENGINEERING CONTROLS

When handlers use closed systems designed by the manufacturer to enclose the pesticide to prevent it from contacting handlers or other people and the system is functioning properly and is used and maintained in accordance with the manufacturer's written operating instructions, the handlers need not wear the chemical-resistant apron. However, the chemical-resistant gloves must be immediately available for use in an emergency, such as a spill or equipment breakdown.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate by disposal of wastes. Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.

Endangered Species

This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult <http://www.epa.gov/espp> before each season's use of this product.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial treaters only. Not for use on agricultural establishments in hopper-box, slurry-box, or other seed treatment applications at, or immediately before, planting. Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal, or by cleaning of equipment.

PESTICIDE STORAGE

Storage at low temperatures is not recommended. Do not store above 95°F. Do not store in direct sunlight.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Contact Bayer CropScience or your chemical supplier for container return instructions. If container is not returned in accordance with instructions, triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LABELING OF TREATED SEED

Seed that has been treated with this product that is then packaged or bagged for future use must contain the following labeling on the outside of the seed package or bag:

- This seed has been treated with clothianidin, trifloxystrobin, carboxin, and metalaxyl.
- Dispose of seed packaging in accordance with local requirements.
- This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult <http://www.epa.gov/espp> before each season's use of this product.
- Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.
- When opening this bag or loading/pouring the treated seed, wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves.
- Treated Seed- Do Not Use for Food, Feed, or Oil Purposes.
- After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. Exception: Once the seeds are planted in soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no worker contact with the soil/media subsurface.
- Rapeseed greens and seed grown or harvested from PROSPER T200-treated seed must not be used for feed or human consumption. Rapeseed grown and harvested from PROSPER T200-treated seed is only for industrial uses and cannot be used for edible oil or any other human/feed consumption.

- Areas planted with treated seed may be replanted immediately with canola, rapeseed and corn. These areas may also be replanted after 30 days with cereal grains, grasses, non-grass animal feeds, soybeans, and dried beans. Do not plant any other crop in the treated area for at least four months after treated seeds are planted.

GENERAL INFORMATION

PROSPER T200 is a systemic insecticide and fungicide seed treatment for use on canola and rapeseed for control of certain insect pests and for control of seed rot, damping off, seedling blight and early season root rot caused by *Pythium*, *Rhizoctonia*, *Fusarium* and *Alternaria*. Also controls seedborne Blackleg. For protection of seeds and emerging seedlings only.

For use in commercially available equipment designed for seed treatment only. Not for use in hopper-box, slurry-box, or similar seed treatment applications used at planting. This product is to be used in liquid or slurry treaters. Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

All seed treated with this product must be conspicuously colored at the time of treatment. If this product contains no colorant, an appropriate colorant must be added to distinguish seed and to prevent subsequent inadvertent use as a food for man or a feed for animals. Regulations pertaining to coloration of treated seed enforced by 40 CFR 153.155 must be strictly adhered to when using this product.

DIRECTIONS FOR USE

Prior to and during application, PROSPER T200 must be thoroughly agitated to ensure uniform mixing.

Canola and Rapeseed: Apply 21.5 fl. oz. of PROSPER T200 to 100 lbs. of seed using commercial seed treatment equipment.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Bayer CropScience, no claims are made to guarantee germination of carry-over seed.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

NET CONTENTS:

PROSPER is a registered trademark of Bayer

PRODUCED FOR



Bayer CropScience

Bayer CropScience LP
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709
1-866-99BAYER (1-866-992-2937)

PROSPER T200 (PENDING) SUBMITTED TO EPA 09/24/07

DATA PACKAGE BEAN SHEET

Date: 12-Dec-2007

Page 1 of 3

Decision #: 373921

DP #: (347454)

PRIA

Parent DP#:

*** Registration Information ***

Registration: **264-1035 - PROSPER T200 INSECTICIDE AND FUNGICIDE SEED TREAT**

Company: 264 - BAYER CROPS SCIENCE LP

Risk Manager: RM 01 - Venus Eagle - (703) 308-8045 Room# PY t S-7228

Risk Manager Reviewer: Barbara Briscoe BBRISCOE

Sent Date: _____

Calculated Due Date: _____

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: _____

Ingredients: See page 3

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 12-Dec-2007

Due Back: _____

DP Ingredient: See page 3

DP Title: RD Label review for reregistration of carboxin

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / IRB

Last Possible Science Due Date: _____

Team Name: RM 01

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Printed on Page 2

*** Data Package Instructions ***

Attn RM t, Venus Eagle

This product is recommended for amended reregistration (this product contains multiple actives) pending your review of label for compliance with the Carboxin RED, technical reviews and Agency label policies. Upon your review, close out with the appropriate reregistration code.

8

DP#: (347454)

Page 2

*** Additio.

Data Package for this Decision ***

Decision#: (373921)

DP #	Division/Branch	Date Sent	Date Due	Instructions?	CSF	Label
345964	SRRD / PRB	26-Oct-2007		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
345964	SRRD / PRB	26-Oct-2007		<input type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No

DP#: (347454)

*** Product and Data Package Ingredients ***

Decision#: (373921)

PC Code	CAS	Ingredient Name
044309	210880-92-5	Clothianidin
090201	5234-68-4	Carboxin
113501	57837-19-1	Metalaxyl
129112	141517-21-7	Trifloxystrobin
113501	57837-19-1	Metalaxyl(.414%)
090201	5234-68-4	Carboxin(3.87%)
129112	141517-21-7	Trifloxystrobin(.552%)
044309	210880-92-5	Clothianidin(11.05%)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 5, 2007

MEMORANDUM:

Subject: Carboxin RED
Prosper® T200
EPA Reg. No.: 264-1035
Re: PRB Preliminary Label Assessment

From: Judy Loranger *Judy Loranger 12/12/07*
Product Reregistration Branch
Special Review and Reregistration Division (7508P)

Through: Lawrence Schnaubelt *Lawrence Schnaubelt 12/12/07*
Product Reregistration Branch
Special Review and Reregistration Division (7508P)

To: Venus Eagle, Product Manager, Risk Management Team 1
Insecticide-Rodenticide Branch
Registration Division (7505P)

SCOPE: The primary purpose of this preliminary label assessment is to determine whether or not the draft labels submitted in connection with product reregistration comply with amended labeling language specified in Chapter V of the subject RED/IREL. Product-specific data (product chemistry, acute toxicity, and in some cases efficacy data) were also required to be submitted or cited to support product reregistration. PRB's reviews of these data are appended to this assessment and may require additional revisions to the product label.

BACKGROUND: The registrant has submitted 5 copies of draft labeling for the subject product in its 8-month response to the RED/IREL. PRB has completed a preliminary assessment of the draft labeling. A copy of this assessment may be accessed electronically on the LAN through the Q-Drive. The path is q:\prb\label\000264\1035.

Note: In addition to the information presented in this preliminary label assessment, Product Manager/Label Reviewers must apply their own knowledge of the subject product and the product's regulatory history (including comparison with existing stamped accepted labeling) to conduct a final review of the proposed label. It is the responsibility of the PM to obtain the necessary label improvements required for final product reregistration.

This product contains multiple active ingredients. PRB has not conducted an in-depth assessment of the label to determine if label requirements for the Metalaxyl RED have been addressed by the registrant. Where differences in PPE and WPS requirements exist, PRB has attempted to adopt the more restrictive language.

PRB recommends that the PMs continue to follow the guidance provided in the Label Review Manual, including formatting suggestions presented in the sample labels in Chapter 3, to improve the quality and consistency of product labels.

RECOMMENDATIONS:

The label contains text as required in the Carboxin RED. However, the subject product requires revisions to conform with the Metalaxyl RED. Deficiencies are listed in the table below. Subject to final review by the Product Manager, PRB recommends that the registrant resubmit to the Product Manager revised product labeling that addresses the deficiencies specified in this review and any other deficiencies specified by the Product Manager.

Appendix I

PRB Label Analysis For Compliance With Label Revisions Specified In the RED/IRED and/or Technical Reviews

Label Requirement	Acceptable	Not Acceptable	Comments
Restricted Use Pesticide	N/A		
Ingredients Statement	X		
Signal Word	X		
First Aid	X		No statements are required per the acute toxicity review. However, PRB has no objection to the First Aid statements currently on the label.
Emergency Information	X		
Note to Physician	N/A		
Hazards to Humans and Domestic Animals	X		No statements are required per the acute toxicity review. PRB has no objection to the Hazards to Humans and Domestic Animals statements currently on the label.
PPE	X		
Engineering Controls	X		
User Safety Requirements	X		
User Safety Recommendations	X		
Environmental Hazards		X	Per the metalaxyl RED, the text below must be added to the Environmental Hazard text currently on the label: "This product contains metalaxyl that is known to leach through soil into groundwater under certain conditions as a result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination."
Physical and Chemical Hazards	N/A		
WPS text	N/A		
Non-WPS text	N/A		
Storage and Disposal	X		
Spray Drift Labeling	N/A		
General Precautions and Restrictions	X		
Application Instructions		X	Because the REI for Metalaxyl is 24 hours, PRB strongly recommends that the text "After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry

Label Requirement	Acceptable	Not Acceptable	Comments
			interval (REI) of 12 bours" be revised to read "do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours."
Other Comments	N/A		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 9, 2007

MEMORANDUM:

Subject: EPA Reg. No.: 264-1035/Prosper T200 Insecticide & Fungicide Seed Treatment
DP Barcode: 344819
Case No.: 0012

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Marianne Lewis 10/9/07

To: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Bayer CropScience
P.O. Box 12014
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

FORMULATION FROM EPA Reg. No. 264-1035 LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Carboxin	3.870%
Clothianidin	11.050%
Metalaxyl	0.414%
Trifloxystrobin	0.552%
<u>Inert Ingredient(s):</u>	<u>84.114%</u>
Total	100.000%

BACKGROUND: In the 8 month response to the Carboxin RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 264-1035. The MRID's are as follows: 468539-02 (81-1), 468539-03 (81-2), 468539-04 (81-3), 468539-05 (81-4), 468539-06 (81-5), 468539-07 (81-6). The studies were conducted by Product Safety Labs and the test material was confirmed as EPA Reg. No. 264-1034. These studies were reviewed and found to be acceptable by TRB/RD on 8/16/06. On 10/31/07, TRB granted the registrants request to cite these studies to support the registration of the subject product. After reviewing the studies PRB/SRRD concurs with RD's findings.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. 264-1035.

The acute toxicity profile for EPA Reg. No. 264-1035 is currently:

Acute Oral	IV	Acceptable
Acute Dermal	IV	Acceptable
Acute Inhalation	IV	Acceptable
Primary Eye	IV	Acceptable
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Acceptable

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 000264-01035

**PROSPER T200 INSECTICIDE & FUNGICIDE
SEED TREATMENT**

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Wear long sleeved shirt, long pants, shoes and socks.

FIRST AID*:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

*Note to Label Reviewers – due to acute toxicity category of IV for all studies no first aid statements are required, however, if the registrant chooses to have them on the label that is acceptable as long as they conform to the above statements.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

DATE OUT: 25/OCT/07

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 344810

REG./FILE SYMBOL NO.: 264-1035

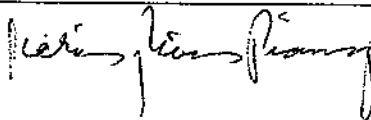
PRODUCT NAME: Prosper T200 Insecticide and Fungicide Seed Treatment

MRID NOS.: 468506-01, 468506-02, 468506-03

COMPANY NAME: Bayer CropScience

ACTION CODE: 674

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508C)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 0012, was issued in September, 2004 for the Technical Grade Active Ingredient (TGAI) Carboxin (5,6-dihydro-2-methyl-N-phenyl-1,4-oxathin-3-carboxamide. According to the RED, the generic data base supporting the reregistration of Carboxin have been reviewed and found to be substantially complete.

In the 8-month response to the Carboxin RED, Bayer CropScience submitted Confidential Statements of Formula (CSF), one basic and one alternate formulation, both dated 8/20/07; a product label (no pin-punch date); and product chemistry data in MRID numbers 468506-01, -02, and -03. The registrant is requesting FIFRA Section 4 reregistration of EPA Reg. No. 264-1035.

FINDINGS:

1. EPA Reg. No. 264-1035 is an end-use product that contains the active ingredients Carboxin, Clothianidin, Trifloxystrobin, and Metalaxyl at label claim nominal concentrations of 3.87%, 11.05%, 0.552%, and 0.414%, respectively.
2. The CSFs for the basic and alternate formulations, dated 8/20/07, are acceptable as presented. The nominal concentrations of the active ingredients agree with that on the label, meeting PR Notice 91-2 (Accuracy of Stated Percentages for Ingredients Statement). The certified limits on the active and the inert ingredients are acceptable in accordance with 40 CFR 158.175(b)(2). All ingredients listed on the CSFs are cleared for use in pesticide formulations and have tolerance exemptions for all food uses.
3. The product chemistry data in the MRIDs listed above were previously submitted to the Registration Division (RD) in connection with the registration of the subject product. These MRIDs were reviewed and accepted by S. Mathur of the TRB/RD on 11/21/06 under DP Barcode number D330683. MRID number 468506-01 pertain to data on Product Identity and Composition, Beginning Materials, Formulation Process, Discussion of Impurities, Color, Physical State, Odor, Oxidation/Reduction Action, Flammability, pH, Viscosity, and Density. Enforcement Analytical Method is found in MRID number 468506-02, and Storage Stability and Corrosion Characteristics are found in MRID number 468506-03. PRB/SRRD concurs that the data are acceptable and satisfy the 40 CFR guideline requirements for 158.155 to 158.190, and may be used to support the reregistration of the subject product.

4. The active ingredient statement on the label is acceptable in accordance with PR Notice 91-2 and 40 CFR 158.155. There are no data present that would trigger the Physical and Chemical Hazards statements on the label. Storage and Disposal section is acceptable in accordance with 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The registrant has satisfied product chemistry data requirements for the reregistration of EPA Reg. No. 264-1035.

Reg # 264-1035 Vol 2

Page _____ is not included in this copy.

Pages 21 through 26 are not included in this copy.

The material not included contains the following type of information:

- _____ Identity of product inert ingredients.
- _____ Identity of product impurities.
- _____ Description of the product manufacturing process.
- _____ Description of quality control procedures.
- _____ Identity of the source of product ingredients.
- _____ Sales or other commercial/financial information.
- _____ A draft product label.
- ☒ The product confidential statement of formula.
- _____ Information about a pending registration action.
- _____ FIFRA registration data.
- _____ The document is a duplicate of page(s) _____.
- _____ The document is not responsive to the request.
- _____ Internal deliberative information.
- _____ Attorney-Client work product.
- _____ Claimed Confidential by submitter upon submission to the Agency.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

EXTRA

PROSPER® T200 Insecticide and Fungicide Seed Treatment

PROSPER T200 contains the following amount of active ingredient per gallon:
1.19 lb. clothianidin; 0.06 lb. trifloxystrobin; 0.42 lb. carboxin; 0.045 lb. metalaxyl.

ACTIVE INGREDIENTS:

Clothianidin: [(C(E))-N-(2-chloro-5-thiazolyl)methyl]-N'-methyl-N"-nitroguanidine	11.05%
Trifloxystrobin.....	0.552%
Carboxin: 5,6-dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide	3.87%
Metalaxyl: N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester	0.414%
OTHER INGREDIENTS:	84.114%

TOTAL 100.00%

EPA Reg. No. 264-1035

EPA Est.

KEEP OUT OF REACH OF CHILDREN CAUTION

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577
For PRODUCT USE Information Call 1-866-99BAYER (1-866-992-2937)

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

In case of emergency call toll free the Bayer CropScience Emergency Response Telephone No. 1-800-334-7577.
Have a product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, neoprene rubber. If you want more options, follow the instructions for category C and E on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, and other handlers must wear:

- long sleeved shirt and long pants,
- socks plus shoes,
- chemical resistant gloves, except when bagging or sewing bags of treated seeds,
- chemical resistant aprons when mixing, loading, or participating in dip treatments.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENGINEERING CONTROLS

When handlers use closed systems designed by the manufacturer to enclose the pesticide to prevent it from contacting handlers or other people and the system is functioning properly and is used and maintained in accordance with the manufacturer's written operating instructions, the handlers need not wear the chemical-resistant apron. However, the chemical-resistant gloves must be immediately available for use in an emergency, such as a spill or equipment breakdown.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate by disposal of wastes. Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.

Endangered Species

This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult <http://www.epa.gov/espp> before each season's use of this product.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial treaters only. Not for use on agricultural establishments in hopper-box, slurry-box, or other seed treatment applications at, or immediately before, planting. Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal, or by cleaning of equipment.

PESTICIDE STORAGE

Storage at low temperatures is not recommended. Do not store above 95°F. Do not store in direct sunlight.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Contact Bayer CropScience or your chemical supplier for container return instructions. If container is not returned in accordance with instructions, triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LABELING OF TREATED SEED

Seed that has been treated with this product that is then packaged or bagged for future use must contain the following labeling on the outside of the seed package or bag:

- This seed has been treated with clothianidin, trifloxystrobin, carboxin, and metalaxyl.
- Dispose of seed packaging in accordance with local requirements.
- This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult <http://www.epa.gov/espp> before each season's use of this product.
- Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.
- When opening this bag or loading/pouring the treated seed, wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves.
- Treated Seed- Do Not Use for Food, Feed, or Oil Purposes.
- After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. Exception: Once the seeds are planted in soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no worker contact with the soil/media subsurface.
- Rapeseed greens and seed grown or harvested from PROSPER T200-treated seed must not be used for feed or human consumption. Rapeseed grown and harvested from PROSPER T200-treated seed is only for industrial uses and cannot be used for edible oil or any other human/feed consumption.

- Areas planted with treated seed may be replanted immediately with canola, rapeseed and corn. These areas may also be replanted after 30 days with cereal grains, grasses, non-grass animal feeds, soybeans, and dried beans. Do not plant any other crop in the treated area for at least four months after treated seeds are planted.

GENERAL INFORMATION

PROSPER T200 is a systemic insecticide and fungicide seed treatment for use on canola and rapeseed for control of certain insect pests and for control of seed rot, damping off, seedling blight and early season root rot caused by *Pythium*, *Rhizoctonia*, *Fusarium* and *Alternaria*. Also controls seedborne Blackleg. For protection of seeds and emerging seedlings only.

For use in commercially available equipment designed for seed treatment only. Not for use in hopper-box, slurry-box, or similar seed treatment applications used at planting. This product is to be used in liquid or slurry treaters. Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

All seed treated with this product must be conspicuously colored at the time of treatment. If this product contains no colorant, an appropriate colorant must be added to distinguish seed and to prevent subsequent inadvertent use as a food for man or a feed for animals. Regulations pertaining to coloration of treated seed enforced by 40 CFR 153.155 must be strictly adhered to when using this product.

DIRECTIONS FOR USE

Prior to and during application, PROSPER T200 must be thoroughly agitated to ensure uniform mixing.

Canola and Rapeseed: Apply 21.5 fl. oz. of PROSPER T200 to 100 lbs. of seed using commercial seed treatment equipment.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Bayer CropScience, no claims are made to guarantee germination of carry-over seed.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

NET CONTENTS:

PROSPER is a registered trademark of Bayer

PRODUCED FOR



Bayer CropScience

Bayer CropScience LP
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709
1-866-99BAYER (1-866-992-2937)

PROSPER T200 (PENDING) SUBMITTED TO EPA 09/24/07

CONFIDENTIAL STATEMENT OF FORMULA ENCLOSED

FILE SYMBOL	REGISTRATION NO.
-------------	------------------

**Do Not Write Comments,
Formula, or Parts of Formula
on This Envelope**

NOTE

It shall be unlawful—for any person to use for his own advantage or to reveal, other than to the Secretary, or officials or employees of the United States Department of Agriculture or other Federal agencies, or to the courts in response to a subpoena, or to physicians, and in emergencies to pharmacists and other qualified persons, for use in the preparation of antidotes, in accordance with such directions as the Secretary may prescribe, any information relative to formulas of products acquired by authority of Section 4 of the "Federal Insecticide, Fungicide, and Rodenticide Act."

[illegible]

Reg # 264-1035 Vol 2

Page _____ is not included in this copy.

Pages 32 through 37 are not included in this copy.

The material not included contains the following type of information:

- _____ Identity of product inert ingredients.
- _____ Identity of product impurities.
- _____ Description of the product manufacturing process.
- _____ Description of quality control procedures.
- _____ Identity of the source of product ingredients.
- _____ Sales or other commercial/financial information.
- _____ A draft product label.
- ☒ The product confidential statement of formula.
- _____ Information about a pending registration action.
- _____ FIFRA registration data.
- _____ The document is a duplicate of page(s) _____.
- _____ The document is not responsive to the request.
- _____ Internal deliberative information.
- _____ Attorney-Client work product.
- _____ Claimed Confidential by submitter upon submission to the Agency.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

PRODUCT REREGISTRATION
SUPPORTING DOCUMENTATION
FOR

Case Name: Carboxin

Reg. No. 264-1035

This supporting documentation (in chronological order) includes:

- Old labels (identified as "Superseded by label dated xx/xx/xx")
- Unacceptable CSFs (marked "Not Acceptable" and dated)
- Product chemistry reviews
- Acute Toxicity reviews
- Efficacy reviews (if necessary)
- 90-day responses to PDCI (Form A and Form B)
- Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- Correspondence

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. 264-1035

Send to SIG: check box ☐

This material is:

New stamped-accepted label

New CSF

Notification

Final Printed Label

Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: _____

Phone: _____ Division: _____

Date: _____



Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0080, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 264-1035	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prosper T200 Insecticide and Fungicide Seed Treatment	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Bayer CropScience PO Box 12014, 2 T.W. Alexander Drive Research Triangle Park, NC 27709 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

BCS' 8 month response to the 1/26/2007 Carboxin Product Specific Data Call In (DCI)

Contact person: jamin.huang@bayercropscience.com

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Jamin Huang		Title Registration Product Manager		Telephone No. (Include Area Code) 919-549-2634	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped) 40
2. Signature 		3. Title Registration Product Manager			
4. Typed Name Jamin Huang		5. Date September 24, 2007			

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
264-1035	09/24/07	000264-01035.PROSPERT200.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.


Signature

09/24/2007

Date

Anna B. Wilkins

Name (typed)

Label Development Specialist

Title



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Bayer CropScience, 2 T.W. Alexander Dr., P.O. Box 12014, RTP, NC 27709	EPA Registration Number/File Symbol 264-1035
Active Ingredient(s) and/or representative test compound(s) Clothianidin, Carboxin, Metalaxyl, Trifloxystrobin	Date September 24, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial, Food Crop	Product Name Prosper T200 Seed Treatment

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Jamin Hunag

Date

Sept. 24, 2007

Typed or Printed Name and Title

Jamin Hunag, Registration Manager

42



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1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date: September 24, 2007	EPA Reg. No./File Symbol: 264-1035	Page 1 of 2
Applicant's/Registrant's Name & Address Bayer CropScience LP 2 T.W. Alexander Drive P.O. Box 12014 Research Triangle Park, NC 27709	Product(s): Prosper T200 Insecticide and Fungicide Seed Treatment	
Ingredient: Carboxin, CAS # 5234-68-4; Metalaxyl, CAS # 57837-19-1; Clothianidin, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-21-7		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830 Series	Product Chemistry (Group A)	46850601 46850602	Bayer CropScience	OWN	
830 Series	Product Chemistry (Group B)	46850601 46850602	Bayer CropScience	OWN	
830.6317	One yr storage stability and corrosive characteristics	46850603	Bayer CropScience	OWN	
870.1100	Acute Oral Toxicity (Rat)	see note	Bayer CropScience	OWN	Supported by 46853902
870.1200	Acute Dermal Toxicity (Rat)	see note	Bayer CropScience	OWN	Supported by 46853903
870.1300	Acute Inhalation Toxicity (Rat)	see note	Bayer CropScience	OWN	Supported by 46853904
870.2400	Primary Eye Irritation (Rabbit)	see note	Bayer CropScience	OWN	Supported by 46853905
870.2500	Primary Dermal Irritation (Rabbit)	see note	Bayer CropScience	OWN	Supported by 46853906
870.2600	Dermal Sensitization	see note	Bayer CropScience	OWN	Supported by 46853907
	All remaining generic data for:				

Signature 	Name and Title: Jamin Huang Registration Product Manager	Date: Sept. 24, 2007
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1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

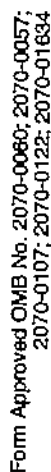
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DATA MATRIX

Date: September 24, 2007	EPA Reg. No./File Symbol: 264-1035	Page 2 of 2
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Ingredient: Carboxin, CAS # 5234-68-4; Metalaxyl, CAS # 57837-t9-t; Clothianidin, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-2-t-7		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Cite-all	Ecological effects		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyl), Sumi-Take (for clothianidin)	FOR	Trifloxystrobin (owned by Bayer CropScience)
Cite-all	Toxicology		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyl), Sumi-Take (for clothianidin)	FOR	Trifloxystrobin (owned by Bayer CropScience)
Cite-all	Environmental Fate		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyl), Sumi-Take (for clothianidin)	FOR	Trifloxystrobin (owned by Bayer CropScience)
Cite-all	Residue chemistry		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyl), Sumi-Take (for clothianidin)	FOR	Trifloxystrobin (owned by Bayer CropScience)

Signature 	Name and Title: Jamin Huang Registration Product Manager	Date: Sept. 24, 2007
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Date: September 24, 2007	EPA Reg. No./File Symbol: 264-1035	Page 1 of 2
Applicant's/Registrant's Name & Address Bayer CropScience LP 2 T.W. Alexander Drive P.O. Box 12014 Research Triangle Park, NC 27709	Product(s): Prosper T200 Insecticide and Fungicide Seed Treatment	
Ingredient: Carboxin, CAS # 5234-68-4; Metolaxyl, CAS # 57837-19-1; Clothianidin, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-21-7		

Guideline Reference Number	Guideline Study Name	MIRID Number	Submitter	Status	Note
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
			Bayer CropScience	OWN	
	All remaining generic data for:				

Signature _____

Name and Title: Jamin Huang
Registration P

Date: Sept. 24, 2007

~~EPA Form 8750-35 (12-2003) Electronic Paper versions available. Submit only Paper version.~~

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45



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date: September 24, 2007	EPA Reg. No./File Symbol: 264-1035	Page 2 of 2
Applicant's/Registrant's Name & Address Bayer CropScience LP 2 T.W. Alexander Drive P.O. Box 12014 Research Triangle Park, NC 27709	Product(e): Prosper T200 Insecticide and Fungicide Seed Treatment	
Ingredient: Carboxin, CAS # 5234-68-4; Metalaxyl, CAS # 57837-19-1; Clothianidin, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-21-7		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Cite-all	Ecological effects			FOR	
Cite-all	Toxicology			FOR	
Cite-all	Environmental Fate			FOR	
Cite-all	Residue chemistry			FOR	

Signature 	Name and Title: Jamin Huang Registration Product Manager	Date: Sept. 24, 2007
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Prosper T200 Insecticide and Fungicide Seed Treatment
EPA Reg. No. 264-1035

Product-Specific Study Requirements (submitted 4/26/07)

OPPTS GLN No.	Study Description	Study Due Date	Bayer Response
Product Chemistry Data Requirements			
830.1550	Product identity and composition	9/26/07	Option 6, MRID No. 46850601
830.1600	Description of materials used to produce the product	9/26/07	Option 6, MRID No. 46850601
830.1620	Description of production process	9/26/07	Option 8, not applicable to an EUP
830.1650	Description of formulation process	9/26/07	Option 6, MRID No. 46850601
830.1670	Discussion of formation of impurities	9/26/07	Option 6, MRID No. 46850601
830.1700	Preliminary analysis	9/26/07	Option 6, MRID No. 46850602
830.1750	Certified limits	9/26/07	Option 6, MRID No. 46850601
830.1800	Enforcement analytical method	9/26/07	Option 6, MRID No. 46850602
830.6302	Color	9/26/07	Option 6, MRID No. 46850601
830.6303	Physical state	9/26/07	Option 6, MRID No. 46850601
830.6304	Odor	9/26/07	Option 6, MRID No. 46850601
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	9/26/07	Option 8, not applicable to an EUP
830.6314	Oxidizing or reducing action	9/26/07	Option 6, MRID No. 46850601
830.6315	Flammability	9/26/07	Option 6, MRID No. 46850601
830.6316	Explosibility	9/26/07	Option 6, MRID No. 46850601
830.6317	Storage stability of product	9/26/07	Option 6, MRID No. 46850603
830.6319	Miscibility	9/26/07	Option 6, MRID No. 46850601
830.6320	Corrosion characteristics	9/26/07	Option 6, MRID No. 46850603
830.6321	Dielectric breakdown voltage	9/26/07	Option 6, MRID No. 46850601
830.7000	pH of water solutions or suspensions	9/26/07	Option 6, MRID No. 46850601
830.7050	UV/visible absorption	9/26/07	Option 8, not applicable to an EUP
830.7100	Viscosity	9/26/07	Option 6, MRID No. 46850601
830.7200	Melting point/melting range	9/26/07	Option 8, not applicable to an EUP
830.7220	Boiling point/boiling range	9/26/07	Option 8, not applicable to an EUP
830.7300	Density/relative density	9/26/07	Option 6, MRID No. 46850601
830.7370	Dissociation constant in water	9/26/07	Option 8, not applicable to an EUP
830.7550	Partition coefficient (n-octanol/water), shake flask method	9/26/07	Option 8, not applicable to an EUP
830.7570	Partition coefficient (n-octanol/water), estimated by liquid chromatography	9/26/07	Option 8, not applicable to an EUP
830.7840	Water solubility: column elution method, shake flask method	9/26/07	Option 8, not applicable to an EUP

830.7860	Water solubility, generator column method	9/26/07	Option 8, not applicable to an EUP
830.7950	Vapor pressure	9/26/07	Option 8, not applicable to an EUP
Toxicology Data Requirements			
870.1100	Acute oral toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853902. Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1200	Acute dermal toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853903 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1300	Acute inhalation toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853904 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2400	Acute eye irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853905 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2500	Acute dermal irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853906 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2600	Skin sensitization	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853907 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)

Responding to Product Specific Study Requirements

- Option 1.** Developing data (conducting a new study to be submitted within time allowed)
- Option 2.** Agreement to share in cost to develop data with one or more registrants
- Option 3.** Offer to share in cost of data development with one or more registrants
- Option 4.** Submitting an existing study that has never been submitted to EPA
- Option 5.** Upgrading a study that EPA said could be upgraded
- Option 6.** Citing an existing study that EPA has previously classified as acceptable
- Option 7.** Request for waiver of data requirement because study is inappropriate for the product
- Option 8.** The product meets the criteria for "not applicable" as expressed in the footnote for that specific Guideline requirement

48

**Prosper T200 Insecticide and Fungicide Seed Treatment
EPA Reg. No. 264-1035**

**Product-Specific Study Requirements
(8 Month DCI Response, dated September 24, 2007)**

- I. Application for Registration (EPA Form 8570-1) dated September 24, 2007
- II. Updated label dated September 24, 2007 (5 copies)
 - Based on approved EPA label dated 12/14/2006
 - Incorporated all of the requested revisions per the January 26, 2007 Carboxin Product Specific DCI Notice
- III. Updated CSFs (basic dated August 20, 2007, alternate dated August 30, 2007, 2 copies each)
 - Based on approved CSFs (basic: CSF ID # 1035.B013, dated 1/30/07; alternate: CSF ID # 1035.A012, dated 1/31/07). A copy of each CSF is attached for your comparison.
 - Added alternates to [REDACTED] **VERY IMPORTANT INFORMATION IS NOT INCLUDED**
 - Updated CSFs (basic: CSF ID # 1035.B014, dated 8/20/07; alternate: CSF ID # 1035.A012, dated 8/30/07). Two copies of each CSF are attached.
- IV. Certification with Respect to Citation of Data (EPA Form 8570-34) dated September 24, 2007, and Data Matrix dated September 24, 2007
- V. No need for any new study reports

Bayer CropScience



September 24, 2007

Document Processing Desk (DCI/SRRD)
Office of Pesticide Programs (7508P)
U.S. Environmental Protection Agency
2777 S. Crystal Drive
One Potomac Yard (South Building)
Arlington, VA 22202

ATTENTION: Barbara Briscoe, Chemical Review Manager (DCI/SRRD)

Re: Carboxin

ID #: PDCI-090201-24633

8 Month Response to Product-Specific Data Call-In

Dear Ms. Briscoe,

Bayer CropScience is herein submitting our 8 month response to the Carboxin Product-Specific Data Call-In Notice received on January 26, 2007. As stated in our 90 day response, we would cancel voluntarily two products -- 1) Gaucho CS Flowable (EPA Reg. No. 264-981) and 2) Cotgard (EPA Reg. No. 264-983), and transfer the registration of Gustafson Vitaflo 280 Flowable Fungicide (EPA Reg. No. 264-947) to Chemtura USA Corporation. This registration transfer was approved by the Agency on June 19, 2007, and its new EPA Reg. No. under Chemtura is 400-564.

The following documents are provided in support of the re-registration of the ten (10) Bayer CropScience's carboxin-containing products, as listed below:

EPA Reg. No. 264-1015	Prevail
EPA Reg. No. 264-1016	Stiletto Pak
EPA Reg. No. 264-1017	Imidacloprid-Vitavax-Metalaxyl
EPA Reg. No. 264-1019	Stiletto
EPA Reg. No. 264-1034	Prosper T400 Insecticide and Fungicide Seed Treatment
EPA Reg. No. 264-1035	Prosper T200 Insecticide and Fungicide Seed Treatment
EPA Reg. No. 264-940	Vitavax-PCNB Flowable Fungicide
EPA Reg. No. 264-943	RTU-Vitavax-Thiram Seed Treatment Fungicide
EPA Reg. No. 264-949	Vitavax PC Peanut Seed Treatment Fungicide
EPA Reg. No. 264-984	Titan FL

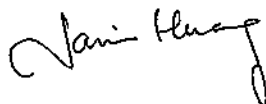
Bayer CropScience
2 T.W. Alexander Drive
P. O. Box 12014
Research Triangle Park,
NC 27709
Tel: 919 549-2000

50

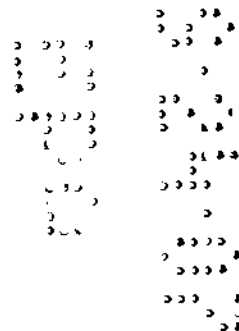
1. A summary sheet listing all of the documents enclosed for each of these 10 products, including
 - Application for Re-registration (EPA Form 8570-1).
 - Five (5) copies of updated labeling per the January 26, 2007 Carboxin Product Specific DCI. Also attach a copy of the updated label with all of the revisions highlighted in yellow in relation to its latest EPA approved label.
 - A CD containing an electronic file of the updated labeling. In addition, a certification with respect to label integrity dated September 24, 2007.
 - Two (2) copies of the Confidential Statement of Formula (CSF) for each of the updated basic and/or alternate formulations. Also attach a copy of the corresponding EPA approved CSFs.
 - Certification with Respect to Citation of Data (EPA Form 8570-34) and a Data Matrix for EPA Internal use and for Public use.
2. Three (3) copies of each of the required study reports. The submittal documents are in the summary sheet for 1) Stiletto (EPA Reg. No. 264-1019), 2) Imidacloprid-Vitavax-Metalaxyl (EPA Reg. No. 264-1017), 3) RTU-Vitavax-Thiram Seed Protectant Fungicide (EPA Reg. No. 264-943) and 4) Vitavax-PCNB Flowable Fungicide (EPA Reg. No. 264-940).

Please contact me at jamin.huang@bayercropscience.com or at 919-549-2634 if you have any questions regarding this 8 month DCI response.

Sincerely,



Jamin Huang, Ph.D.
Product Registration Manager



Attachments

Prosper T200 Insecticide and Fungicide Seed Treatment
EPA Reg. No. 264-1035

Product-Specific Study Requirements

OPPTS GLN No.	Study Description	Study Due Date	Bayer Response
Product Chemistry Data Requirements			
830.1550	Product identity and composition	9/26/07	Option 6, MRID No. 46850601
830.1600	Description of materials used to produce the product	9/26/07	Option 6, MRID No. 46850601
830.1620	Description of production process	9/26/07	Option 8, not applicable to an EUP
830.1650	Description of formulation process	9/26/07	Option 6, MRID No. 46850601
830.1670	Discussion of formation of impurities	9/26/07	Option 6, MRID No. 46850601
830.1700	Preliminary analysis	9/26/07	Option 6, MRID No. 46850602
830.1750	Certified limits	9/26/07	Option 6, MRID No. 46850601
830.1800	Enforcement analytical method	9/26/07	Option 6, MRID No. 46850602
830.6302	Color	9/26/07	Option 6, MRID No. 46850601
830.6303	Physical state	9/26/07	Option 6, MRID No. 46850601
830.6304	Odor	9/26/07	Option 6, MRID No. 46850601
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	9/26/07	Option 8, not applicable to an EUP
830.6314	Oxidizing or reducing action	9/26/07	Option 6, MRID No. 46850601
830.6315	Flammability	9/26/07	Option 6, MRID No. 46850601
830.6316	Explosibility	9/26/07	Option 6, MRID No. 46850601
830.6317	Storage stability of product	9/26/07	Option 6, MRID No. 46850603
830.6319	Miscibility	9/26/07	Option 6, MRID No. 46850601
830.6320	Corrosion characteristics	9/26/07	Option 6, MRID No. 46850603
830.6321	Dielectric breakdown voltage	9/26/07	Option 6, MRID No. 46850601
830.7000	pH of water solutions or suspensions	9/26/07	Option 6, MRID No. 46850601
830.7050	UV/visible absorption	9/26/07	Option 8, not applicable to an EUP
830.7100	Viscosity	9/26/07	Option 6, MRID No. 46850601
830.7200	Melting point/melting range	9/26/07	Option 8, not applicable to an EUP
830.7220	Boiling point/boiling range	9/26/07	Option 8, not applicable to an EUP
830.7300	Density/relative density	9/26/07	Option 6, MRID No. 46850601
830.7370	Dissociation constant in water	9/26/07	Option 8, not applicable to an EUP
830.7550	Partition coefficient (n-octanol/water), shake flask method	9/26/07	Option 8, not applicable to an EUP
830.7570	Partition coefficient (n-octanol/water), estimated by liquid chromatography	9/26/07	Option 8, not applicable to an EUP
830.7840	Water solubility: column elution method, shake flask method	9/26/07	Option 8, not applicable to an EUP

830.7860	Water solubility, generator column method	9/26/07	Option 8, not applicable to an EUP
830.7950	Vapor pressure	9/26/07	Option 8, not applicable to an EUP
Toxicology Data Requirements			
870.1100	Acute oral toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853902. Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1200	Acute dermal toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853903 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1300	Acute inhalation toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853904 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2400	Acute eye irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853905 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2500	Acute dermal irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853906 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2600	Skin sensitization	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853907 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)

Responding to Product Specific Study Requirements

- Option 1.** Developing data (conducting a new study to be submitted within time allowed)
- Option 2.** Agreement to share in cost to develop data with one or more registrants
- Option 3.** Offer to share in cost of data development with one or more registrants
- Option 4.** Submitting an existing study that has never been submitted to EPA
- Option 5.** Upgrading a study that EPA said could be upgraded
- Option 6.** Citing an existing study that EPA has previously classified as acceptable
- Option 7.** Request for waiver of data requirement because study is inappropriate for the product
- Option 8.** The product meets the criteria for "not applicable" as expressed in the footnote for that specific Guideline requirement

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address		2. Case # and Name		3. Date and Type of DCI and Number					
BAYER CROSCIENCE LP 2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709		0012 Carboxin		23-Jan-2007 PRODUCT SPECIFIC ID # PDCI-090201-24633					
4. Guideline number	5. Study Title	6. Use Pattern			7. Test Substances	8. Time Frame (Months)	9. Registrant Response		
		Progress Reports							
		P	R	O	T	O	C	O	L
830.1550	Product Chemistry Data Requirements (Conventional Chemical)								
830.1600	Product identity and composition (38)								
830.1620	Description of materials used to produce the product (17)								
830.1650	Description of production process (18)								
830.1670	Description of formulation process (16)								
830.1700	Discussion of formation of impurities (20)								
830.1750	Preliminary analysis (86, 37-38)								
830.1800	Certified limits (10, 11)								
830.1850	Enforcement analytical method (23)								
830.1900	Color (12)								
830.1950	Physical state (35)								
830.2000	Odor (28)								

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment, or both, where applicable law.

Signature and Title of Company's Authorized Representative Raymond Mandy

12 Name of Company

Bayer Crop Science

13. Phone Number

719-549-2634

**United States Environmental Protection
Agency Washington, D.C. 20460**

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address		2. Case # and Name		3. Date and Type of DCI and Number		7. Test Substance	8. Time Frame (Months)	9. Registrant Response
BAYER CROPSCIENCE LP 2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709		0012 Carboxin EPA Reg. No. 284-1035		23-Jan-2007 PRODUCT SPECIFIC ID # PDCI-090201-24833				
4. Guideline Number	5. Study Title	P R O T O C O L	8. Use Pattern			8. Time Frame (Months)	9. Registrant Response	
			Progress Reports	1	2			3
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	(42, 43)				TGAI	8	8
830.6314	Oxidizing or reducing action	(30)				MP/EP	8	6
830.6315	Flammability	(25)				MP/EP	8	6
830.6316	Explosibility	(24)				MP/EP	8	6
830.6317	Storage stability of product	(44)				MP/EP	8	6
830.6318	Miscibility	(28)				MP/EP	8	6
830.6320	Corrosion characteristics	(13)				MP/EP	8	6
830.6321	Dielectric breakdown voltage	(19)				MP/EP	8	6
830.7000	pH of water solutions or suspensions	(33, 34)				TGAI/MP/EP	8	6
830.7060	UV/Visible absorption					TGAI/PAI	8	8
830.7100	Viscosity	(47)				MP/EP	8	6
830.7200	Melting point/melting range	(26, 27)				TGAI	8	8

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54

Date

4/13/07

55

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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Use additional sheet(s) if necessary.

1. Company Name and Address		2. Case # and Name		3. Date and Type of DCI and Number		7. Test Substance	8. Time Frame (Months)	9. Registrant Response
BAYER CROSCIENCE LP 2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709		0012 Carboxin EPA Reg. No. 264-1035		23-Jan-2007 PRODUCT SPECIFIC ID # PDCI-090201-24633				
4. Guideline Requirement Number	5. Study Title	6. Use Pattern			7. Test Substance	8. Time Frame (Months)	9. Registrant Response	
		Progress Reports	1	2				3
P R O T O C O L								
830.7220	Boiling point/boiling range (67-69)					TGAI	8	8
830.7300	Density/relative density (14, 15)					TGAI/MP/EP	8	6
830.7370	Dissociation constant in water (21, 22)					TGAI/MP/EP	8	8
830.7550	Partition coefficient (n-octanol/water), shake flask method (32)					TGAI/PAI	8	8
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography (31)					TGAI/PAI	8	8
830.7840	Water solubility: Column elution method, shake flask method (49)					TGAI or PAI	8	8
830.7860	Water solubility, generator column method (48)					TGAI or PAI	8	8
830.7950	Vapor pressure (45, 46)					TGAI or PAI	8	8
Toxicology Data Requirements (Conventional Chemical)								
670.1100	Acute Oral Toxicity (7)					TGAI, EP, dilute EP?	8	6
870.1200	Acute dermal toxicity (3, 4)					TGAI, EP, dilute EP?	8	6
870.1300	Acute inhalation toxicity (6)					TGAI & EP	8	6

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(full text of certification is on page one).

JA

Date

4/13/07

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address		2. Case # and Name		3. Date and Type of DCI and Number		7. Test Substance	8. Time Frame (Months)	9. Registrant Response
BAYER CROPSCIENCE LP 2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709		0012 Carboxin EPA Reg. No. 284-1035		23-Jan-2007 PRODUCT SPECIFIC ID # PDCI-090201-24833				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	6. Use Pattern			Progress Reports	8. Time Frame (Months)	9. Registrant Response
			1	2	3			
870.2400	Acute eye irritation	(6)	A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6		
870.2500	Acute dermal irritation	(1, 2)	A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6		
870.2600	Skin sensitization	(40-50)	A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6		

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(full text of certification is on page one).

JM

Date

4/13/07

57